

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Sandy Hanebrink,

Plaintiff,

vs.

The City of Simpsonville, TRZ Management, LLC,
and John Does 1-3,

Defendants.

Case No.: 6:19-cv-00290-TMC

**PLAINTIFF'S MOTION TO AMEND
COMPLAINT**

Plaintiff hereby files her Motion to Amend Plaintiff's Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. A copy of Plaintiff's Amended Complaint is attached hereto as **Exhibit A**. In support of this Motion, Plaintiff states the following:

1. Plaintiff originally instituted this action by filing her original Complaint in the South Carolina Court of Common Pleas for Greenville County on September 13, 2018.
2. Thereafter, Defendant City of Simpsonville filed a Notice of Removal of the case from the Court of Commons Pleas for Greenville County to the United States District Court for the District of South Carolina on January 31, 2019 [Dkt No. 1].
3. Defendant City of Simpsonville filed an Answer [Dkt. No. 6] on February 1, 2019, 2019. On March 1, 2019, Defendant TRZ Management, LLC filed an Answer [Dkt. 10].
4. Plaintiff now wishes to amend her Complaint to add an additional cause of action pursuant to Title II of the Americans with Disabilities Act, as set forth in the attached Exhibit A.
5. In accordance with Rule 15(a)(2) and by way of consultation, counsel for Plaintiff provided notice to counsel for the Defendants that Plaintiff wished to amend her

Complaint. Counsel for Defendants have indicated that Defendants consent to the filing of the amended Complaint.

6. Pursuant to Rule 15(a)(2), and as is applicable to this Motion, the Court should freely give leave for a party to amend its pleading when the opposing party consents thereto and justice so requires.
7. Plaintiff files this motion in good faith and not for the purposes of delay.
8. Plaintiff believes that no prejudice would result from allowing Plaintiff to amend her Complaint as the above-captioned matter is in the earliest stages and no discovery has yet been conducted.

Respectfully submitted,

____s/ Hannah Rogers Metcalfe_____
Hannah Rogers Metcalfe, Fed. I.D. #9443
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June 28, 2019
Greenville, South Carolina